

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Avon Products Inc. Securities Litigation

No. 19-cv-01420-MKV
CLASS ACTION

**NOTICE OF LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES
AND EXPENSES AND AWARDS PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

PLEASE TAKE NOTICE, that court-appointed Lead Counsel Levi & Korsinsky, LLP respectfully moves the Court before the Hon. Mary Kay Vyskocil, United States District Judge, Southern District of New York, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure, and the Private Securities Litigation Reform Act, 15 U.S.C. §78u-4(a)(4): (A) awarding attorneys' fees in the amount of \$4,350,000 (30% of the Settlement Fund); (B) reimbursing litigation expenses in the amount of \$157,000; and (C) approving awards pursuant to 15 U.S.C. §78u-4(a)(4) to Lead Plaintiff, Holly Ngo, and additional named plaintiff, David Klungle, in the amounts of \$7,500 and \$1,220 respectively.

PLEASE TAKE FURTHER NOTICE, that in support of its motion, Lead Counsel will rely upon:

(A) the accompanying Declaration of Gregory M. Nespole in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4) and the exhibits thereto;

(B) the accompanying Declaration of Christine M. Fox on Behalf of Labaton Sucharow LLP in Support of Application for an Award of Attorneys' Fees and Expenses and the exhibit thereto;

(C) the accompanying Declaration of Holly Ngo in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4);

(D) the accompanying Declaration of David Klungle in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4); and

(E) the accompanying Declaration of Jessie Mahn Regarding (I) Mailing of Notice and Proof of Claim Form; (II) Publication of Summary Notice; (III) Call Center Services; (IV) the Settlement Website; and (V) Requests for Exclusion and Objections Received to Date and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Order Granting Preliminary Approval of Settlement dated August 31, 2020 (ECF 74), the Final Approval Hearing is scheduled to be held before the Court on January 20, 2021 at 2:00 PM, in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007.

A proposed Order will be submitted prior to the Final Approval Hearing.

Dated: New York, New York
December 16, 2020

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